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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re

Gawker Media LLC, *et al.*,¹

Debtors.,

Chapter 11

Case No.16-11700 (SMB)

(Jointly Administered)

**JOINDER OF CHARLES J. HARDER ESQ. AND
HARDER MIRELL & ABRAMS LLP TO THIEL PARTIES' MOTION TO EXTEND
CERTAIN DEADLINES UNDER RULE 2004 ORDER**

Charles J. Harder, Esq. ("Mr. Harder") and Harder Mirell & Abrams LLP (the "Harder Firm" together with Mr. Harder, the "Harder Parties") hereby file this joinder to the *Thiel Parties' Motion to Extend Certain Deadlines Under Rule 2004 Order* [Docket No. 1080] (the "Motion").² In support of this joinder, the Harder Parties respectfully submit as follows:

¹ The last four digits of the taxpayer identification number of the debtors are: Gawker Media LLC (0492); Gawker Media Group, Inc. (3231); and Gawker Hungary Kft. (f/k/a Kinja Kft.) (5056). Gawker Media LLC and Gawker Media Group, Inc.'s mailing addresses are do Opportune LLP, Attn: William D. Holden, Chief Restructuring Officer, 10 East 53rd Street, 33rd Floor, New York, NY 10022. Gawker Hungary Kft.'s mailing address is c/o Opportune LLP, Attn: William D. Holden, 10 East 53rd Street, 33rd Floor, New York, NY 10022.

² Capitalized terms used but not otherwise defined herein shall have the meanings assigned to them in the Motion.

1. On December 14, 2017, the Plan Administrator served its subpoenas on the Harder Parties (the “**Subpoenas**”) seeking, as described in the Motion, wide-ranging discovery, including requests relating to persons, entities, and topics never mentioned in the Plan Administrator’s original motion and 2004 Order. In connection with counsel’s agreement to accept service on behalf of the Harder Parties, the Harder Parties and the Plan Administrator agreed to (i) a January 16, 2018 deadline to serve objections to the Subpoenas; (ii) a February 20, 2018 deadline to begin producing documents; and (iii) a March 7, 2018 deadline to provide a privilege log.

2. On January 16, 2018, in accordance with the agreed schedule and the 2004 Order, the Harder Parties timely served their objections (the “**Objection**”) to the Subpoenas and related requests for production. On January 29, 2018, counsel for the Harder Parties telephonically attended—but did not substantively participate in—the Thiel Parties’ meet and confer with the Plan Administrator. The Harder Parties and the Plan Administrator have exchanged written correspondence to, among other things, schedule a meet and confer.

3. There is substantial overlap between the Thiel Parties’ and Harder Parties’ positions with respect to a number of substantive and procedural objections to the Subpoenas and requests for production, including, among other things, the need for a list of agreed search terms before conducting any electronic searches for nonprivileged responsive documents (if any exist). The Harder Parties will continue to work in good faith with the Plan Administer to schedule a meet and confer and address other outstanding issues, but as discussed in greater detail in the Motion, given the many significant unresolved issues among the parties (including that the protective order has not yet been agreed), the Harder Parties’ document production likewise will not commence (let alone be completed), or any privilege log be served, by the dates set forth in

the 2004 Order, as modified by the parties' previous agreement. Under the circumstances, and for efficiency's sake, the Harder Parties submit that the discovery process can now be consolidated and proceed on a single, reasonable timeline together with the Thiel Parties, without prejudice to the Plan Administrator or any other party.

4. Counsel for the Harder Parties contacted counsel for the Plan Administrator to express the Harder Parties' position that the discovery process should proceed on a single, extended timeline. Accordingly, the Harder Parties respectfully request that the Court grant the relief requested in the Motion.

RESERVATION OF RIGHTS

5. The Harder Parties reserve the right to amend or supplement this joinder before the hearing on the Motion, and be heard before this Court with respect to the subject matter of the Motion.

WHEREFORE, for the reasons set forth herein, the Harder Parties respectfully request that the Court (i) grant the Motion and (ii) grant the Harder Parties such other and further relief as the Court may deem just and proper.

Dated: New York, New York
February 13, 2018

NORTON ROSEFULBRIGHT US LLP

/s/ Samuel S. Kohn

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